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Counsel for Defendant CHAMBERLAIN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN CHAMBERLAIN,

Defendant.

Case No. CR 14-316 VC

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE

The parties are jointly requesting that the hearing on defendant Ryan Chamberlain's Motion to Dismiss presently set for July 7, 2015 at 1:00 p.m. be continued to July 28, 2015 at 1:00 p.m. and that his reply brief now be due on July 14, 2015.

Under the current briefing schedule, Mr. Chamberlain's reply brief is due on June 23, 2015. Since setting the briefing schedule, defense counsel was set for trial in another matter. That trial commenced on June 22, 2015. Accordingly, given trial preparation and now trial, defense counsel has not had adequate time to complete the reply brief and is requesting additional time to do so. That would also require moving the hearing date. The government has no objection to this request. Accordingly, the parties stipulate that Mr. Chamberlain's reply brief be due on July 14, 2015 and the hearing be continued to July 28, 2015.

1 Time is excluded from the Speedy Trial Act because a motion is currently pending. 18 U.S.C. §
2 3161(h)(1)(D).

3 IT IS SO STIPULATED.

4
5 6/23/15
6 DATED


/s/
ELISE BECKER
Assistant United States Attorney

7
8 6/23/15
9 DATED

/s/
JODI LINKER
Assistant Federal Public Defender

10 IT IS SO ORDERED.

11 June 25, 2015
12 DATED


VINCE CHHABRIA
United States District Judge